

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RECLAIM THE RECORDS and BROOKE
SCHREIER GANZ,

Plaintiffs,

- against -

UNITED STATES DEPARTMENT OF
VETERANS AFFAIRS, including its
Components, the Office of General Counsel,
the Veterans Benefits Administration,
and the Veterans Health Administration,

Defendant.

NOTICE OF CROSS MOTION

No. 18-CV-8449

PLEASE TAKE NOTICE that upon the affirmation of David B. Rankin of Beldock
Levine & Hoffman, LLP, sworn to on October 11, 2019 and the accompanying Memorandum of
Law, the undersigned will request this Court located at Thurgood Marshall United States
Courthouse, 40 Foley Square, New York, NY 10007 at a time of the Court's convenience for an:

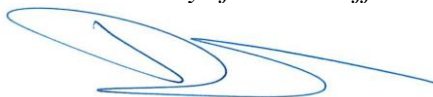
1. Order to produce of the documents requested through Freedom of Information Act ("FOIA"), 5 U.S.C. §§552 *et seq.*, following Judgement thought Fed. R. Civ. P. 56; and
2. Other such relief as the Court finds just and proper.

[///]

Dated: October 11, 2019
New York, New York

Respectfully submitted,

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